VIA ELECTRONIC DELIVERY

April 8, 2022

Karen A. Cahill
Division of Environmental Remediation
New York State Department of Environmental Conservation, Region 7
615 Erie Boulevard West
Syracuse, NY 13204-2400

Subject: **Revised Scope of Work for Updating Fire Water Reservoir Area Groundwater Isopleths**
Former Emerson Power Transmission Facility, Ithaca, New York, Site No. 755010
Order on Consent #A7-0125-87-09

Dear Karen:

On behalf of Emerson Electric Co. (Emerson), WSP is pleased to submit this proposed scope of work for the former Emerson Power Transmission Site in Ithaca, New York. The scope of work was developed based on a request by the New York State Department of Environmental Conservation (NYSDEC) to provide an updated understanding of the distribution of affected groundwater within specific hydrogeologic zones proximate to the former Fire Water Reservoir (FWR).

The scope of work will update isopleth maps illustrating the distribution of affected groundwater within the B- and C- hydrologic zones and create a new isopleth map for the D- hydrologic zone in the immediate vicinity of the FWR and downgradient of the former reservoir. The isopleths shall be developed based on data for the wells shown in Figure 1, including:

Data for wells to be sampled in March 2022 pursuant to the Interim Site Management Plan (SMP):

EXB-7	MW-5B	MW-8B	MW-36B
EXB-9	MW-5-25	MW-12C	MW-46-43C
EXB-10	MW-5-40	MW-13C	MW-46-72C
MW-1B	MW-7B	MW-15C	MW-50-160D
MW-4B	MW-8B	MW-32B	

The most recent data for wells that are to be sampled pursuant to the SMP but not scheduled for sampling as part of the March 2022 event:

MW-2B	MW-7-40	MW-17-40
MW-3B	MW-8-40	MW-20B
MW-5-100	MW-16-100	MW-22B

Data for the extraction wells sampled in on October 7, 2021 (results to be included in DPE Report# 26):

EW-1-62C	EW-4-25B	EW-7-25B	EW-10-25B
EW-2-62C	EW-5-25B	EW-8-62C	EW-11-43C
EW-3-60C	EW-6-60C	EW-9R-72C	EW-12-45C

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Data for wells MW-30B, MW-31B, and MW-9-100, which are not part of the SMP but were sampled concurrent with the March 2022 SMP event.

The most recent data for wells MW-23B and MW-24B. MW-23B was last sampled in June 2017 but was subsequently destroyed and not replaced; MW-24B was last sampled in April 2016 and was subsequently abandoned to facilitate construction activities.

WSP shall redevelop monitoring wells MW-30B, MW-31B, and MW-9-100 at minimum of 1 week prior to implementing the March 2022 sampling event. Monitoring wells MW-30B and MW-31B have not been sampled since at least January 2016 and MW-9-100 has not been sampled since October 2015. Redevelopment is proposed to remove any build-up of sediment which may have occurred since the wells were last sampled. The total depths measured in the field will be compared to the recorded installation depths to ensure this goal is achieved. WSP shall utilize dedicated bailers, peristaltic or submersible pumps, surge blocks, or a combination thereof for development purposes and as appropriate for conditions encountered. Fluids generated during the activity, including water generated during decontamination of equipment, shall be contained at the well heads and managed using the onsite groundwater treatment system.

The groundwater sampling event is tentatively scheduled for implementation in the latter half of March 2022. All sample-related activities shall be performed in accordance with WSP's Field Standard Operating Procedures (SOPs), the NYSDEC's Draft Department of Environmental Remediation (DER) Technical Guidance (DER-10) for Site Investigation and Remediation (2010), and the U.S. Environmental Protection Agency (EPA) *Low Stress (Low Flow) Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells* (EPA 2017) as indicated in the SMP.

A summary letter report shall be prepared following receipt of the validated sample results. The report shall include: a summary of the field activities, including any notable observations; an explanation if specific B-, C-, or D- zone monitoring wells overlap hydraulic zones; and isopleths in plan view illustrating the distribution of affected groundwater in each of the B, C, and D hydrogeologic zones relative to total site-related compounds of < than 100 micrograms per liter (µg/l), $\geq$ 100 to < 1,000 µg/l, and > 1,000 µg/l from the vicinity of the FWR. Each figure will show the estimated demarcation boundary where fracture zones transition to a different fracture zone, depending on the elevation along the hillside relative to the FWR.

Please contact us should have any questions or comments during your review of the proposed scope of work.

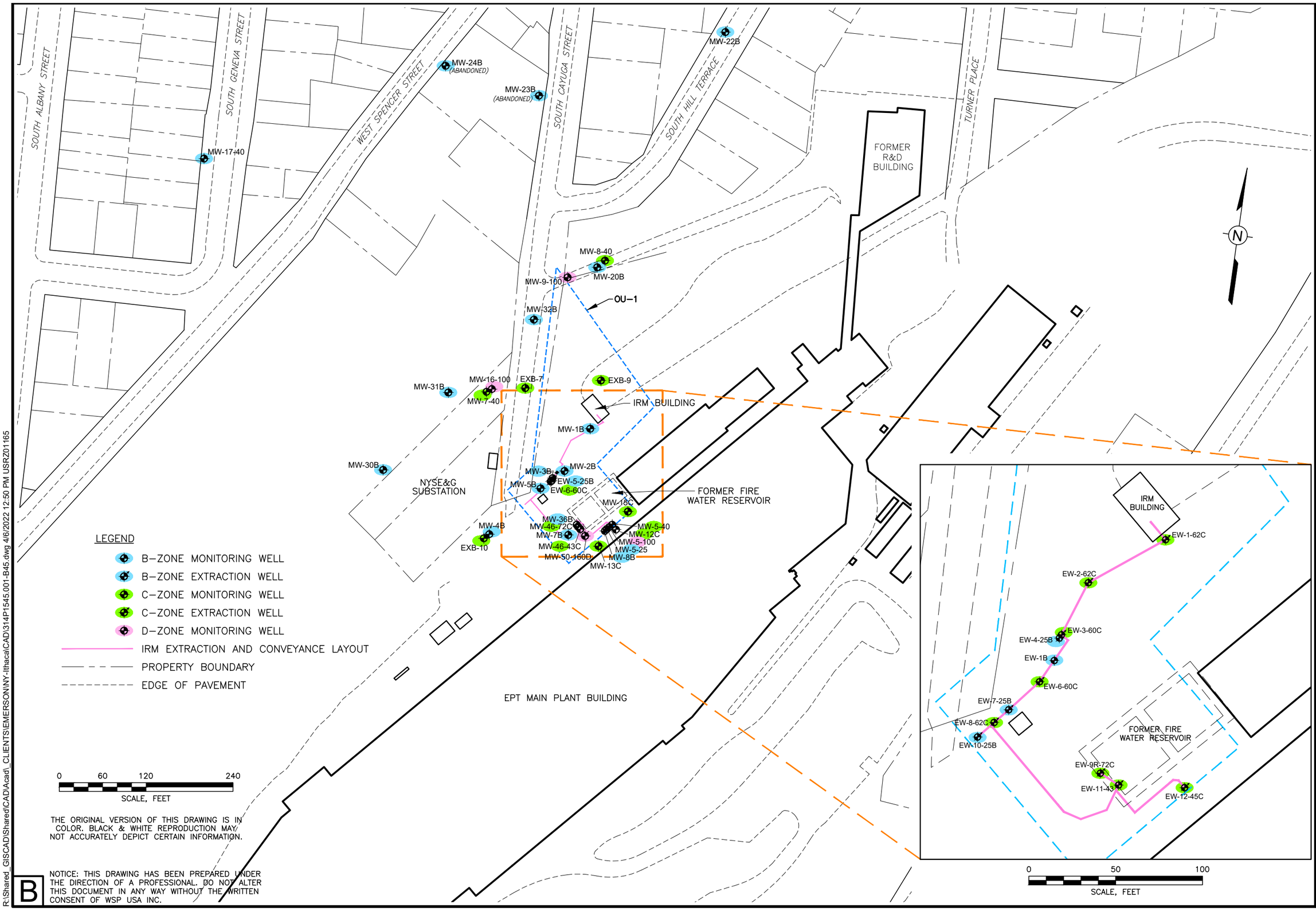
Kind regards,

Scott Haitz
Vice President, National Practice Lead

Enclosure

MEF: JRB: SPH
K:\Emerson\ITHACA\IRM\IRM - Treatment System\IRM_Progress_Reports\DPE Report #25\Working Files (not for report)\DPE Report #24 Comments\B-C-D-Zone Work Plan

cc: Stephen Clarke, Emerson
Anthony Perretta, NYSDOH



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Drawn By: RAT 04/05/2022
Checked: [illegible] 04/06/2022
Approved:
Dwg Name: 314P1545.001–B45

FORMER EMERSON POWER TRANSMISSION
ITHACA, NEW YORK
PREPARED FOR
EMERSON
ST. LOUIS, MISSOURI

FIGURE 1

DISTRIBUTION OF WELLS MONITORING THE B, C, AND D HYDROGEOLOGIC ZONES (FIRE WATER RESERVOIR AREA)

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